

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO:
v.	:	
		DATE FILED:
SUNJE PEARLMAN	:	
		VIOLATION: 18 U.S.C. § 1347 (health care
	:	fraud – 1 count)
		Notice of forfeiture

INFORMATION

COUNT ONE
(Health Care Fraud)

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Defendant SUNJE PEARLMAN was employed by Andrew Berkowitz, M.D. (charged elsewhere) who operated a practice under the name A+ Pain Management (hereinafter referred to as “A+”) located at 10745 Haldeman Avenue, Philadelphia, PA 19116. Berkowitz dispensed generic prescription drugs at A+ for which he submitted claims to, and obtained payments from, health care benefit programs. Berkowitz stocked wholesale quantities of inexpensive generic brands of prescription drugs, such as topical analgesics, muscle relaxers, anti-inflammatories, and Schedule IV controlled substances indicated for pain, anxiety, and insomnia, which he billed out at a significant mark-up.
2. Defendant SUNJE PEARLMAN managed the prescription drug dispensing program at A+. Defendant PEARLMAN submitted fraudulent claims for medically unnecessary prescription drugs prescribed by Andrew Berkowitz to defendant PEARLMAN and to defendant PEARLMAN’s friends and family members. After the health care benefit

programs paid the bogus claims, defendant PEARLMAN obtained a portion of the fraud proceeds from Berkowitz.

3. From in or about August 2014 through in or about December 2017, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SUNJE PEARLMAN

knowingly and willfully executed, and attempted to execute, a scheme and artifice to defraud health care benefit programs, including Independence Blue Cross, in connection with the delivery of and payment for health care benefits, items, and services, and to obtain by means of false and fraudulent pretenses, representations, and promises, money and property owned by and under the custody and control of health care benefit programs, including Independence Blue Cross, by submitting claims for medically unnecessary prescription drugs of approximately \$345,136.

All in violation of Title 18, United States Code, Section 1347.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 1347, set forth in this indictment, defendant

SUNJE PEARLMAN

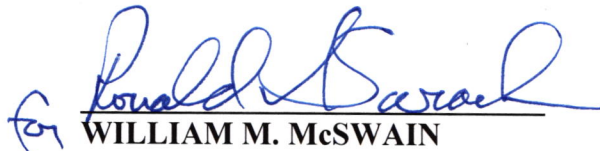
shall forfeit to the United States of America any property that constitutes or is derived from gross proceeds traceable to the commission of such offense.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(7).


for **WILLIAM M. McSWAIN**
United States Attorney